

Application GRANTED. The conference, previously scheduled for September 5, 2024, is hereby ADJOURNED to **12:00 p.m. on the same day.**
SO ORDERED.



Barbara Moses
United States Magistrate Judge
August 29, 2024

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August 29, 2024

Via CM/ECF Filing

Honorable Barbara Moses, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, Room 740
New York, New York 10007

Re: BakeMark USA LLC v. Negron, et al.,
Case No. 1:23-cv-02360-AT-BCM

Dear Judge Moses:

This firm is counsel to defendants, Brian Negron, Jose Negron Jr., and NF Transportation LLC (collectively, the “*Non-Debtor Defendants*”),¹ in the above-referenced action. We write with the consent of plaintiff, BakeMark USA LLC (“*BakeMark*”), to respectfully request an adjournment of the September 5, 2024, conference currently scheduled for 10:00 a.m. (*see* Order [ECF No. 125]), to either: (i) 11:00 a.m. or 12:00 p.m. on the same day, September 5, 2024; or, alternatively (ii) a time convenient for the Court on September 6, 2024, or September 11, 2024, or some other future date and time as amenable to the Court’s schedule.

The Non-Debtor Defendants respectfully submit that sufficient good cause for the adjournment exists as lead counsel for the Non-Debtor Defendants is unavailable at 10:00 a.m. September 5, 2024, due to a personal matter, and counsel for BakeMark is unavailable later that afternoon. Consequently, the Non-Debtor Defendants respectfully submit that the requested adjournment should be granted under the circumstances.

If Your Honor requires any additional information or has any questions, the undersigned can be reached via email (jfinkelstein@coleschotz.com) or phone (201-525-6293). As always, the Court’s time and attention to this matter are greatly appreciated.

Respectfully submitted,

COLE SCHOTZ P.C.

/s/ Jason R. Finkelstein

CC: All Counsel of Record Via CM/ECF Jason R. Finkelstein

¹ Defendant Bakers Depot LLC (“*Bakers Depot*”) filed for relief under Chapter 11 of the United States Bankruptcy Code, and Cole Schotz P.C. has not been retained in the bankruptcy proceeding to act as special litigation counsel here.